

I have been commercially involved with power-line based RF ("common carrier") communications since 1980, and most recently with similar indoor and outdoor systems of the sort envisioned in the Proceeding.

Therefore, it is little surprise to me, with the advent of modern digital signal processing technology, that proposals exist for carrying data communications on existing power transmission lines.

These proposals are fundamentally flawed from an economic standpoint.

I am a professional communications technology business analyst by trade. I hold one related US Patent, and now have pending thirteen more patent applications in this technology area. Despite this level of effort, and after trying my level best to do so for over a decade: I cannot create a sound business model where a firm can make money deploying such a system for broadband data access, and also justify the economic costs of the interference such a deployment would cause to over-the-air services in the same frequency range.

Other technologies, such as those being standardized now by the IEEE 802.3ah Task Force, present a far more viable solution for delivery of broadband content over existing media.

This Proceeding should therefore be summarily dismissed, as the "BPL" technology under consideration cannot be made to be profitable - and therefore will not reach the goal of being deployed widely in the United States.